

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES LIABILITY
INSURANCE CO., INC., AS INSURER OF
ADMINASERVICE, INC.,

Plaintiff,

v.

ADVANTIUS, INC., NEAL BERGSTROM,
ROBERT STEVENS, CHARLES CAMBRA
III, JONATHAN K. DRIGGS, AND
WORKFORCE SOLUTIONS, INC.,

Defendants.

Civil No. 0411824 PBS

**MOTION OF EDWARD V. COLBERT, III FOR LEAVE TO PERMIT
APPEARANCE OF ERIC OLSON *PRO HAC VICE* FOR THE PLAINTIFFS**

Edward V. Colbert, III, attorney for the Defendants, Jonathan K. Driggs, Charles R. Cambra III and Workforce Solutions, Inc. ("Defendants"), pursuant to Local Rule 83.5.3, hereby moves for leave to permit the appearance of attorney Erik A. Olson of Salt Lake City, Utah on behalf of the Defendants, *pro hac vice*, in this action. In support of this Motion, Edward V. Colbert, III states as follows:

1. I am a member in good standing of the Bar of this Court and I am counsel of record for the Defendants in this action.
2. The certificate of Eric Olson, filed concurrently herewith, shows that (i) he is a member of the Bar in good standing in every jurisdiction where he has been admitted to practice; (ii) there are no disciplinary proceedings pending against him as a member of the Bar in any

jurisdiction; and (iii) he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

3. Mr. Olson is an experienced corporate lawyer, specializing in representing companies in commercial litigation matter, he is particularly familiar with the facts and law relevant to the Plaintiffs' claims for relief in this action and is best suited to represent the Defendants' interests in this case.

WHEREFORE, Edward V. Colbert, III prays that the Court grant this Motion to allow Eric Olsen to appear *pro hac vice* on behalf of the Defendants, Jonathan K. Driggs, Charles R. Cambra III and Workforce Solutions, Inc., in this action.

November 23, 2004

/s/ Edward Colbert
Edward V. Colbert, III (BBO # 566187)
P. Andy Henderson, Jr. (BBO # 655891)
LOONEY & GROSSMAN LLP
101 Arch Street
Boston, MA 02110
(617) 951-2800